

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JUNZHOU HUANG,

Plaintiff,

v.

Partnerships and Unincorporated Associations
identified in Schedule A

Defendants.

Case No.: 1:22-cv-00809

JURY TRIAL DEMANDED

PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff Junzhou Huang (“Plaintiff”) files this Motion requesting leave to file the following documents under seal: (1) Schedule A attached to the Complaint, which includes a list of the Defendant and the Defendant Internet Stores; (2) screenshot printouts showing the active Defendant Internet Stores (Exhibit 1 to the Complaint); and (3) Exhibit 2 to the Complaint, which includes the asserted design patent. In this action, Plaintiff is requesting temporary *ex parte* relief based on an action for design patent infringement.

Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court’s power to grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will move to unseal these documents.

DATED February 14, 2022.

Respectfully submitted,

/s/ Zhangyuan Ji

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